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March 13, 2020

BY ECF

Hon. Lewis J. Liman
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Application for adjournment of previously set April 8,
2020 conference is GRANTED. The status conference is
RESET for May 4, 2020 at 4:00 p.m.

Date: 3/13/2020

Re: Ivanov v. Builderdome, et al
Case No. 19 cv 3422


LEWIS J. LIMAN
United States District Judge

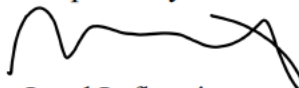
Dear Judge Liman:

I represent the above referenced Plaintiff. This letter is sent jointly with counsel for the Defendants to update the Court regarding the status of this case pursuant to the Court's Order dated February 25, 2020. We also respectfully request an adjournment of the status conference scheduled for April 8, 2020.

Both parties confirm that all discovery in this case, including fact and expert discovery, is complete. Plaintiff and Defendants both intend to submit letters requesting a pre-motion conference for an anticipated dispositive motion. The current deadline for that submission is March 25, 2020.

Finally, Plaintiff has a conflict for the conference scheduled for April 8, 2020 and respectfully requests an adjournment. Defendants consent to such application, and the parties have conferred and are both available on April 15, 16, or 17, or the first week in May (Defendants are available on the April dates but would prefer the first week in May).

Respectfully submitted,


Jared Lefkowitz